UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Miami Division

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Plaintiff,

Case No. 23-cv-21377-DPG

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MICHAEL D. COHEN,

Defendant.

CERTIFICATE OF ALEXANDER NOCKS

I, Alexander Nocks, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certify that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the bar for the State of New York; and (3) I have not filed three or more motions for *pro hac vice* admission in this District within the last 365 days.

Dated: September 28, 2023

/s/ Alexander Nocks
Alexander Nocks